

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**GEOTAG, INC.,****Plaintiff,****v.****CANON INC. and,  
CANON U.S.A., INC.,****Defendants.**§  
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§**No. 2:12-cv-043-MHS****JURY TRIAL DEMANDED**

**GEOTAG, INC.'S RESPONSE TO DEFENDANT  
CANON U.S.A., INC.'S MOTION TO STAY**

Plaintiff GeoTag, Inc. ("GeoTag") hereby files its Response to Defendant Canon U.S.A., Inc.'s ("Canon U.S.A.") Motion to Stay filed on June 14, 2012, Dkt. No. 25. Because Canon U.S.A.'s Stay request has been extensively briefed in related actions involving GeoTag, GeoTag incorporates by reference the prior briefing as follows, along with the following exhibits attached hereto:

<b>Exhibit<sup>1</sup></b>	<b>Title</b>	<b>Date</b>	<b>Dkt. No.<sup>2</sup></b>
A	GeoTag, Inc.'s Response in Opposition to the Motion to Stay Filed by Certain Defendants	07/12/2011	320
B	GeoTag, Inc.'s "Corrected" Response to Moving Defendants' Motion to Stay	03/07/2012	483
C	GeoTag, Inc.'s Sur-Reply in Opposition to Moving Defendants' Renewed Motion to Stay	03/21/2012	490
D	GeoTag, Inc.'s Response to Movants' Notice of Additional Authority	4/3/2012	494
E	GeoTag, Inc.'s Response to Defendants' Motion to Stay	6/18/2012	368

<sup>1</sup> Due to CM/ECF file size limitations, only the prior briefing is attached hereto. The prior exhibits may be found attached to the briefing in the related actions as identified by the Dkt. No. referenced in the chart.

<sup>2</sup> The citations for Exhibits A–D are to Case No. 2:10-cv-574. The citation for Exhibit E is to Case No. 2:11-cv-405. Identical versions of these documents can be found in the related GeoTag cases.

For the reasons set forth in the attached briefing, GeoTag respectfully requests that the Court deny Canon U.S.A.'s Motion to Stay.

Dated: July 2, 2012

Respectfully submitted,

**BUETHER JOE & CARPENTER, LLC**

By: /s/ Monica Tavakoli

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**ATTORNEYS FOR PLAINTIFF GEOTAG,  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a) on this 2<sup>nd</sup> day of July, 2012. Any other counsel of record will be served by facsimile transmission.

/s/ Monica Tavakoli  
Monica Tavakoli